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Roy Romer, Governor Patti Shwayder, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

HAZARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION http://www.cdphe.state.co.us/hm/

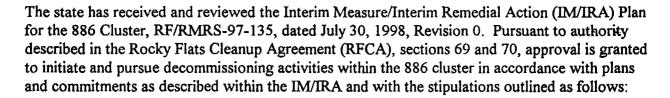
4300 Cherry Creek Dr. S. Phone (303) 692-3300 Fax (303) 759-5355 August 3, 1998

222 S. 6th Street, Room 232 Denver, Colorado 80246-1530 Grand Junction, Colorado 81501-2768 Phone (970) 248-7164 Fax (970) 248-7198

Ms. Regina Sarter **RFCA Project Coordinator** Rocky Flats Environmental Technology Site P.O. Box 928 Golden, Colorado 80402-0928

RE: B886 IM/IRA Approval

Dear Ms. Sarter:



- Section 4.1 of the IM/IRA indicates that initiation of any activity associated with this 1) decommissioning project is contingent upon completion of a "management review" [readiness assessment] of the project's infrastructure, procedures and personnel by DOE, CDPHE and the integrating contractor management. CDPHE sees this commitment as essential and reminds RFETS that no activities are authorized without completion of these collaborative reviews.
- 2) Paragraph 60 of RFCA provides CDPHE authority to: a) "observe all activities performed pursuant to this agreement" b) "review records, files and documents relevant to this agreement" and c) "ensure that work is performed properly and pursuant to EPA and CDPHE protocols, standards, regulations and guidance, as well as pursuant to Attachments [of RFCA] and approved decision documents."
- 3) Work or scope beyond those described in the approved IM/IRA must be authorized in accordance with provisions of Part 10 of RFCA. The CDPHE project coordinator may request or require field modifications to work in accordance with RFCA Paragraph 60(e).
- 4) Some issues remain to be resolved relating to Kaiser Hill's proposal to dispose of clean building rubble within the tunnel at the demolition site. The impact of this proposal on future land use needs to be investigated and agreed upon amongst the agencies and the stakeholders. Substantive requirements for this solid-waste disposal need to be





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determined and agreed upon. Potential interference with environmental sampling of the soils beneath the tunnel needs to be considered.

Until these issues are resolved, the IM/IRA proposal to dispose of clean rubble at the 886 site is not approved. We propose a meeting of our staffs and stakeholders in the very near future to discuss and resolve these issues.

Thank you for your cooperation in the production of this IM/IRA for decommissioning of the 886 cluster. The state believes that the necessary information, regulatory commitments and activity controls exist within the document to indicate that the project can commence with assurance that public health and the environment will be protected.

Should you have any questions or need for clarification regarding this letter, please call Edd Kray at 966-2115.

Sincerely,

Steven H. Gunderson

CDPHE RFCA Project Coordinator

Edd Kray

CDPHE 886 D&D Project Manager

Eld Kruy

cc:

John Whiting, K-H

Marla Broussard, RMRS

John Rampe, DOE

Alan Parker, K-H

Tim Rehder, EPA

Bob Warther, DNFSB